IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA at Charleston

THE WEST VIRGINIA COALITION
AGAINST DOMESTIC VIOLENCE, INC.,

Plaintiff,

v. : Case No. 2:19-cv-00434

(Judge John T. Copenhaver, Jr.)

PATRICK J. MORRISEY, in his official capacity as Attorney General for the State of West Virginia

:

Defendant.

PLAINTIFF'S MOTION TO EXCEED PAGE LIMIT IN MEMORANDUM IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

Plaintiff, the West Virginia Coalition Against Domestic Violence, Inc. ("Plaintiff"), by undersigned counsel, respectfully request that this Court extend the page limitation for their forthcoming memorandum in support of a motion for summary judgment by five pages. This Motion is made pursuant to L.R. Civ. P. 7.1.

Plaintiff seeks leave for up to an additional five pages for its memorandum in support of its motion for summary judgment, such that Plaintiff's memorandum would be no more than 25 pages. Plaintiff's motion presents several constitutional claims that require in-depth analysis and argument. The motion also addresses a relatively new West Virginia statute that has not previously been the subject of adjudication. For this reason, review and discussion of case law from other jurisdictions is necessary to fully address the novel issues presented. Finally, because Plaintiff is a member organization comprised of independent domestic violence programs, Plaintiff anticipates presenting and discussing evidence from several of its members concerning the variety of ways

that West Virginia's law impacts their programs. An additional five pages will allow for a full and fair briefing of Plaintiff's arguments in support of its motion. Plaintiff submits that these reasons serve as good cause for permitting the requested page extension.

Accordingly, Plaintiff requests that the Court find that Plaintiff has demonstrated good cause to exceed the page limitation set forth in L.R. Civ. P 7.1. and extend the page limitation of for Plaintiff's forthcoming memorandum in support of motion for summary judgment to 25 pages rather than 20.

Respectfully submitted,

J. David Fenwick

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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2021, I electronically filed the foregoing Plaintiff's Motion to Exceed Page Limit in Memorandum in Support of Motion for Summary Judgment with the Clerk of The United States District Court for the Southern District of West Virginia using the CM/ECF system. All participants are registered CM/ECF users and will be served by the CM/ECF system.

J. David Fenwick

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Counsel for the West Virginia Coalition Against Domestic Violence, Inc.